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6 UNITED STATES DISTRICT COURT

7 NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: SOCIAL MEDIA ADOLESCENT
9 ADDICTION/PERSONAL INJURY
10 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

11 This Document Relates to:
12 ALL ACTIONS

**PLAINTIFF'S REPLY TO META'S
STATEMENT IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

14 Plaintiffs filed their Master Complaint on February 14, 2023. *See* ECF No. 138. Plaintiffs
15 redacted significant portions of their pleadings, respecting Defendants' preliminary designation of
16 certain materials as highly confidential. In addition, and in accordance with the Stipulated Order
17 Governing Sealing Procedures, ECF No. 132, Plaintiffs filed administrative motions to consider
18 whether these materials from the Meta, Snap, and TikTok Defendants should remain sealed. ECF
19 Nos. 133, 134, 137.

21 Subsequently, the TikTok and Snap Defendants indicated that they do not in fact request that
22 the Court seal any of portion of Plaintiffs' Master Complaint. ECF Nos. 139, 146. Meta Defendants
23 have moved to seal the names of four non-party employees but otherwise have indicated that
24 redactions to the Complaint are not necessary. ECF No. 151.

26 In the interest of avoiding a dispute before the Court, and in recognition of the fact that Meta
27 Defendants have taken a suitably limited view of the appropriate redactions for Plaintiffs' Master

1 Complaint, Plaintiffs agree to the redactions proposed by Meta Defendants. Despite this agreement,
2 Plaintiffs do not waive and expressly preserve their right to challenge in the future, should the issue
3 arise, the propriety of keeping sealed employee names in the underlying documents or in other court
4 filings.

5 As directed by the Court, *see* ECF No. 164 at 5-6, the parties will be filing a joint
6 administrative motion requesting that the Court enter on the public docket a version of Plaintiffs'
7 Master Complaint that seals the names identified by Meta Defendants but removes all other
8 redactions.
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10 Dated: March 7, 2023

Respectfully submitted,

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